

Ainsworth Declaration Exhibit C

The Honorable James L. Robart

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STARK, *et al.*

Plaintiffs,

v.

THE SEATTLE SEAHAWKS, FOOTBALL
NORTHWEST, LLC, *et al.*,

Defendants.

Case No. CV06-1719 JLR

**THE SEAHAWKS DEFENDANTS' OBJECTIONS AND RESPONSES TO
PLAINTIFF'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Defendants the Seattle Seahawks, Football Northwest LLC, and First & Goal Inc. (collectively the "Seahawks Defendants") hereby respond to the First Interrogatories and Requests for Production of Documents served by Plaintiffs Fred and Kathleen Stark on February 16, 2007.

GENERAL OBJECTIONS

1. The Seahawks Defendants object to the Interrogatories and Document Requests to the extent that they seek information protected by the attorney-client, work product, common interest or joint defense privilege.

1 2. The Seahawks Defendants object to the Interrogatories and Document
2 Requests' definition of the term "Qwest Field" on the ground that it is overbroad, unduly
3 burdensome, and seeks information neither relevant nor likely to lead to the discovery of
4 admissible evidence. As used in the following responses, the term "Qwest Field" means the
5 football stadium where Seattle Seahawks' home games are now played.
6

7 3. The Seahawks Defendants object to the Interrogatories and Document
8 Requests' instruction relating to the term "identify" on the ground that it is overbroad, unduly
9 burdensome, and seeks information neither relevant nor likely to lead to the discovery of
10 admissible evidence.
11

12 4. The Seahawks Defendants object to the Interrogatories and Document
13 Requests' definition of the term "security" on the ground that it is overbroad, unduly
14 burdensome, and seeks information neither relevant nor likely to lead to the discovery of
15 admissible evidence. As used in these responses, the term "security" means measures
16 undertaken by or at the direction of the Seahawks Defendants for the purpose of protecting
17 Patrons attending Public Events at Qwest Field from criminals or terrorists.
18

19 5. The Seahawks Defendants object to the definition of the term "pat-down"
20 as vague and overbroad. Unless otherwise specified, as used in these responses, the term "pat-
21 down" refers to the upper-body physical inspection described in the January 3, 2007
22 declaration of Milton E. Ahlerich.
23

24 6. The Seahawks Defendants object to the Interrogatories and Document
25 Requests to the extent they purport to impose obligations beyond those set forth in the Federal
26 Rules of Civil Procedure.
27

RESPONSES AND OBJECTIONS TO INTERROGATORIES

INTERROGATORY NO. 1: Withdrawn by plaintiffs' February 23, 2007

letter.

INTERROGATORY NO. 2: Please identify each person partly or wholly

responsible for establishing, creating, enforcing, implementing, or overseeing the policies and procedures relating to security at Qwest Field.

ANSWER: The following persons and entities have or had responsibility for establishing, creating, or overseeing policies and procedures relating to security at Qwest Field for Seattle Seahawks games.

Defendant First & Goal Inc.

Defendant The Seattle Seahawks, Football Northwest, LLC

Paul Schieck
Assistant General Manager, First & Goal Inc.
(Primary responsibility for security operations)

David Young
Director of Event Services, First & Goal Inc.
(Reports to Paul Schieck)

Susan Darrington
General Manager, First & Goal Inc.
(Immediate supervisor of Paul Schieck)

The National Football League
280 Park Avenue
New York, NY 10017

Milton E. Ahlerich
Vice President of Security, National Football League

Robert F. Agnew

1 Security Representative, National Football League

2
3 To the extent that this request seeks additional information, the Seahawks
4 Defendants object on the ground that it is overbroad, unduly burdensome and seeks
5 information that is neither relevant nor likely to lead to the discovery of admissible evidence.
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7 **INTERROGATORY NO. 3:** Please describe in detail the policies and
8 procedures in effect at Qwest Field relating to security, terrorist attacks, threats of terrorist
9 attacks, the safety of workers, and/or the safety of Patrons.

10 **ANSWER:** Pursuant to Fed R. Civ. P. 33(d), in response to this Interrogatory
11 and to the extent such documents have not already been produced, the Seahawks Defendants
12 will produce documents that reflect their policies and procedures relating to security
13 screenings of Patrons attending Seattle Seahawks games, including the Qwest Field and Event
14 Center Life Safety Management Plan. To the extent that this Interrogatory seeks additional
15 information, the Seahawks Defendants object on the ground that it is overbroad, unduly
16 burdensome and seeks information that is neither relevant nor likely to lead to the discovery of
17 admissible evidence.
18

19 **INTERROGATORY NO. 4:** Please describe your involvement, if any, in the
20 creation, development, institution, enforcement, or implementation of the policy or procedure
21 requiring "pat-down" searches of individuals attending Seahawks games at Qwest Field.
22

23 **ANSWER:** The Seahawks Defendants are responsible for implementing the
24 NFL pat-down policy at Seattle Seahawks games held at Qwest Field. The Seahawks
25 Defendants had no involvement in the creation or development of the NFL pat-down policy.
26 To the extent that this Interrogatory seeks additional information, the Seahawks Defendants
27

1 object on the ground that it is vague, overbroad, unduly burdensome and seeks information
2 that is neither relevant nor likely to lead to the discovery of admissible evidence.

3 **INTERROGATORY NO. 5:** Please describe any policies or procedures
4 relating to conducting “pat-down” searches, bag searches, metal detection devices, explosive-
5 sniffing dogs, or other similar security measures for events other than Seahawks games at
6 Qwest Field.

7
8 **ANSWER:** Pat-downs and bag searches are required for all college football
9 games at Qwest Field, including Washington State University football games and the annual
10 “Battle in Seattle” football game between Central Washington University and Western
11 Washington University. Pat-downs and bag searches may be conducted at other Qwest Field
12 events as determined on an event-by-event basis after consultation with the event promoter.
13 To the extent that this Interrogatory seeks information in addition to that provided in response
14 to this Interrogatory and Interrogatory 3, the Seahawks Defendants object on the ground that it
15 is vague, overbroad, unduly burdensome, and seeks information that is neither relevant nor
16 likely to lead to the discovery of admissible evidence.

17
18 **INTERROGATORY NO. 6:** Please identify each Public Event which
19 occurred at Qwest Field since July 2002.

20 **ANSWER:** Pursuant to Fed. R. Civ. P. 33(d), the Seahawks Defendants will
21 produce documents from which a list of each Public Event held at Qwest Field since July 2002
22 can be compiled. To the extent that this Interrogatory seeks additional information, the
23 Seahawks Defendants object on the ground that it is overbroad, unduly burdensome and seeks
24 information that is neither relevant nor likely to lead to the discovery of admissible evidence.
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1 **INTERROGATORY NO. 7:** For each event identified in response to
2 Interrogatory No. 6, please describe the Patron screening procedures employed, including but
3 not limited to whether bag searches, pat-down searches, explosive-sniffing dogs, metal
4 detection devices were used on Patrons attending the event.

5 **ANSWER:** To the extent that this Interrogatory seeks information other than
6 that provided in response to Interrogatories 3 and 5, above, the Seahawks Defendants object
7 on the ground that it is overbroad, unduly burdensome, and seeks information that is neither
8 relevant nor likely to lead to the discovery of admissible evidence.

9 **INTERROGATORY NO. 8:** Withdrawn by plaintiffs' February 23, 2007
10 letter.
11

12 **INTERROGATORY NO. 9:** Please identify any and every company,
13 contractor, or subcontractor that is providing, has provided, or with whom you have or have
14 had a contractual agreement to provide security services at Qwest Field, stating for each the
15 specific services provided.
16

17 **ANSWER:** The following entities provide or have provided security services
18 at Qwest Field for Public Events:

19 Staff Pro, Inc.
20 Corporate Office
21 15272 Newsboy Circle
22 Huntington Beach, CA 92649

23 ODP, Inc.
24 Larry Harvey
25 261 East Fairway Drive
26 Allyn, WA 98524

27 Contemporary Services Corporation
28 10550 Lake City Way NE, Suite D
 Seattle, WA 98125

1 Staff Pro, Inc. provides personnel who conduct bag searches and pat-downs at
2 Public Events at Qwest Field; its responsibilities include hiring, training and directly
3 supervising those employees. Staff Pro, Inc. has performed these services since August 2006.
4 Prior to August 2006, Contemporary Services Corporation provided similar services.
5

6 ODP, Inc. provides off-duty police officers positioned throughout Qwest Field
7 before and during each Seattle Seahawks game. The off-duty police officers are available in
8 the event that routine law enforcement matters, such as disorderly conduct by a ticketholder,
9 should arise. The off-duty officers do not participate, conduct, direct or otherwise assist in the
10 security screening procedures, including the pat-downs; they are positioned at least 25 feet
11 away from the gates. To the extent that this Interrogatory seeks additional information, the
12 Seahawks Defendants object on the ground that it is overbroad, unduly burdensome and seeks
13 information that is neither relevant nor likely to lead to the discovery of admissible evidence.
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15 **INTERROGATORY NO. 10:** Withdrawn by plaintiffs' February 23, 2007
16 letter.
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18 **INTERROGATORY NO. 11:** Please identify and describe all threats of
19 terrorist or other violent attacks, including but not limited to suicide bomb attacks, against
20 Qwest Field or Patrons or employees at Qwest Field of which you have been informed or of
21 which you have become aware since July 2002. Such descriptions shall include the date of the
22 threat, the date on which you became aware of such threat, the nature of the threat, and the
23 source of your information regarding such threat.
24

25 **ANSWER:** In addition to the substantial threat of terrorism at Qwest Field
26 identified and described in the January 25, 2007 Declaration of Michael Sheehan, the
27

1 Seahawks Defendants learned on or about October 17, 2006, of a reported plot to launch a
2 coordinated attack using "dirty" bombs against seven NFL stadiums, including Qwest Field.
3 The Seahawks Defendants learned of the report through communications with Milton
4 Ahlerich, NFL Vice President of Security, who received information from the Federal Bureau
5 of Investigation. Several days later, the Seahawks Defendants learned that law enforcement
6 had determined the plot to be a hoax. To the extent that this Interrogatory seeks additional
7 information, the Seahawks Defendants object on the ground that it is overbroad, unduly
8 burdensome and seeks information that is neither relevant nor likely to lead to the discovery of
9 admissible evidence.
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11 **INTERROGATORY NO. 12:** Withdrawn by plaintiffs' February 23, 2007
12 letter.

13 **INTERROGATORY NO. 13:** Withdrawn by plaintiffs' February 23, 2007
14 letter.

15 **INTERROGATORY NO. 14:** Are you aware of any specific instance in
16 which Qwest Field security personnel have discovered any explosive device or devices at
17 Qwest Field through "pat-down" searches or any other means? If so, please describe the facts
18 and circumstances surrounding such discovery.
19

20 **ANSWER:** To date, the security measures described in response to prior
21 interrogatories have been successful in ensuring that no explosive device have entered or been
22 detonated at Qwest Field.
23

24 **INTERROGATORY NO. 15:** Please identify and describe any and all
25 incidents or reports of violence or threatened violence at Qwest Field of which you are aware
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1 which involved the use of firearms, explosives, incendiary devices, weapons of mass
2 destruction or other devices capable of harming large numbers of people.

3 **ANSWER:** To the extent that this Interrogatory seeks information other than
4 that provided in response to Interrogatory 11, above, the Seahawks Defendants object on the
5 ground that it is duplicative, overbroad, unduly burdensome, and seeks information that is
6 neither relevant nor likely to lead to the discovery of admissible evidence.
7

8 **INTERROGATORY NO. 16:** Please identify and describe all incidents or
9 reports of violence or threatened violence at any stadium in which a National Football League
10 team plays of which you are aware which involved the use of firearms, explosives, incendiary
11 devices, weapons of mass destruction or other devices capable of harming large numbers of
12 people.
13

14 **ANSWER:** Aside from the information set forth in the January 25, 2007
15 Declaration of Michael Sheehan, the Seahawks Defendants do not have information about
16 what may have occurred at stadia other than Qwest Field.

17 **INTERROGATORY NO. 17:** For each incident, event, or threat identified in
18 response to Interrogatories 13, 14, 15 or 16, please describe with particularity your response or
19 the response of any of the defendants in this lawsuit or of the National Football League, if any,
20 to such incident, event or threat.
21

22 **ANSWER:** In response to this Interrogatory, the Seahawks Defendants
23 incorporate by reference their responses to Interrogatories 3 and 5, above, as well as the
24 Declarations of Michael Sheehan and Milton Ahlerich previously provided to plaintiffs'
25 counsel. To the extent that this Interrogatory seeks additional information, the Seahawks
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Defendants object on the ground that it is overbroad, unduly burdensome, and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence.

INTERROGATORY NO. 18: Please describe the nature and extent of your authority relating to security measures at Qwest Field, including but not limited to conducting pat-down or other searches of Patrons attending events at Qwest Field.

ANSWER: As the master tenant under its Master Lease Agreement with Washington Public Stadium Authority, First & Goal Inc. has "[w]ithout limitation ... the exclusive power and authority to possess, operate, use, sublease and enter into use, license, concession, and other agreements with respect to" Qwest Field. Master Lease Agreement, § 2.1. Therefore, First & Goal Inc.'s authority relating to stadium operations, including all security measures, is plenary. With respect to Seattle Seahawks games in particular, the Seahawks Defendants have exclusive authority to set conditions for admission. Tickets to Seattle Seahawks games are revocable licenses and, as stated on the back of each ticket:

Admission may be refused or ticket holder ejected at the sole discretion of the Seattle Seahawks and/or First & Goal, master tenant of Qwest Field, subject to refund, or without refund if the ticket holder is deemed to be disorderly, or fails to comply with these terms, the Fan Code of Conduct or any and all security measures.

INTERROGATORY NO. 19: Withdrawn by plaintiffs' February 23, 2007 letter.

INTERROGATORY NO. 20: Identify the date and from whom you first learned that the NFL had adopted a policy requiring pat-down searches of all Patrons at NFL games. Identify the date and from whom you first learned that the NFL's pat-down policy would be implemented at Qwest Field.

1 **ANSWER:** The Seahawks Defendants were informed by memorandum from
 2 NFL Commissioner Paul Tagliabue on August 18, 2005, that an upper-body pat-down would
 3 be required of all Patrons entering NFL stadia on game day. On August 24, 2005, the
 4 Seahawks Defendants received more detailed information relating to the pat-down procedure
 5 from Milton Ahlerich, NFL Vice President of Security.
 6

7 **INTERROGATORY NO. 21:** Please describe the various levels of security
 8 alert at Qwest Field (i.e., “yellow”, “orange”, etc...) and, for each level, identify the specific
 9 time periods (by date) during which each such alert level was in effect.

10 **ANSWER:** The Seahawks Defendants have produced a document, bearing
 11 Bates numbers FGI 0030-31, that identifies two Fan Screening Levels that potentially may be
 12 used at Seattle Seahawks games. The “yellow” level is currently used at Qwest Field. The
 13 “orange” level may be used in the event that the United States Department of Homeland
 14 Security raises the Threat Advisory Level or other circumstances arise that warrant increased
 15 security. Throughout the 2005 and 2006 NFL seasons, the alert level was “yellow.” To the
 16 extent that this Interrogatory seeks additional information, the Seahawks Defendants object on
 17 the ground that it is vague, overbroad, unduly burdensome and seeks information that is
 18 neither relevant nor likely to lead to the discovery of admissible evidence.
 19

20 **INTERROGATORY NO. 22:** If there has ever been a change in the level of
 21 alert at Qwest Field, please describe the reason for the change, identify the person who
 22 directed that the alert level be changed, and identify each event or communication relied upon
 23 as a basis for that change.
 24

25 **ANSWER:** There has never been a change in the level of alert at Qwest Field.
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1 **INTERROGATORY NO. 23:** Withdrawn by plaintiffs' February 23, 2007
2 letter.

3 **INTERROGATORY NO. 24:** Explain why full-body pat-downs are not
4 conducted at Qwest Field and at other venues where NFL games are played.
5

6 **ANSWER:** In response to this Interrogatory, the Seahawks Defendants state
7 that plaintiffs' premise -- the premise of this Interrogatory -- is incorrect. Full body pat-down
8 searches have been conducted at other venues where NFL games are played, including every
9 venue since and including 2002 that has hosted a Super Bowl.

10 **INTERROGATORY NO. 25:** Please identify the number of people arrested
11 and the number of people refused access to Qwest Field as a result of the pat-down screening
12 at Seahawks games.
13

14 **ANSWER:** As far as the Seahawks Defendants are aware, no one has been
15 arrested as a result of pat-downs at Seahawks games. In addition, no one has been refused
16 access to Qwest Field as a result of pat-downs at Seahawks games.

17 **INTERROGATORY NO. 26:** Have the security screeners at Qwest Field
18 ever found any contraband as a result of the "pat-down" searches during the 2005 and 2006
19 seasons? If so, describe the contraband and the action taken by the screeners upon finding
20 such contraband.
21

22 **ANSWER:** The security screening process at Qwest Field, including pat-
23 downs, bag searches, and visual inspections, have identified items that are prohibited from
24 being brought into the stadium. These items include knives, alcohol, and noisemakers. If a
25 prohibited item is discovered by a security screener, the person carrying the prohibited item is
26 given the option of discarding or returning the item to his vehicle.
27

1 **INTERROGATORY NO. 27:** Who pays for security at Qwest Field? For
 2 each of the 2005 and 2006 seasons (including pre and post-season games), how much did it
 3 cost to have pat-down screeners at Seahawks home games?

4 **ANSWER:** The Seahawks Defendants pay for security at Qwest Field for pre-
 5 season and regular season Seattle Seahawks games. Security costs for any post-season games
 6 played at Qwest Field are paid by the Seahawks Defendants and reimbursed by the National
 7 Football League. To the extent that this Interrogatory seeks additional information, the
 8 Seahawks Defendants object on the ground that it is overbroad, unduly burdensome and seeks
 9 information that is neither relevant nor likely to lead to the discovery of admissible evidence.
 10

11 **INTERROGATORY NO. 28:** Identify the number of Patrons who have
 12 complained about the pat-down policy at Qwest Field. Please describe the procedure, if any,
 13 by which security screeners conducting pat-downs handle and report such complaints.
 14

15 **ANSWER:** The Seahawks Defendants object to this Interrogatory on the
 16 grounds that the term "complaints" is vague and overbroad, and on the ground that it seeks
 17 information neither relevant nor likely to lead to the discovery of admissible evidence. The
 18 Seahawks Defendants have received "complaints" about the pat-down procedures that have
 19 nothing to do with the issues in this case. For example, some patrons have "complained" that
 20 the lines created by the pat-down policy are too long, that there are not enough female
 21 screeners to screen female patrons, or that the pat-downs should be more extensive.
 22 Notwithstanding this objection, the Defendants Seahawks state that over the course of the
 23 2005 and 2006 seasons, during which 1,209,913 persons participated in the pat-down
 24 procedures as a condition of admission to Seahawks games at Qwest Field, the Seahawks
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1 Defendants received approximately 25 "complaints" of all kinds, including the kinds listed
 2 above, about the pat-down procedures.

3 In further response to this Interrogatory, the Seahawks Defendants state that
 4 screeners are trained to contact a supervisor if a ticketholder objects to the pat-down
 5 procedure. Supervisors are trained to respond to questions from ticketholders regarding the
 6 pat-down policy. In the event a ticketholder chooses not to participate in the pat-down
 7 procedure, supervisors are trained to direct the ticketholder to the Seattle Seahawks ticket
 8 office for a refund.
 9

10 To the extent that this Interrogatory seeks additional information, the Seahawks
 11 Defendants object on the ground that it is overbroad, unduly burdensome and seeks
 12 information that is neither relevant nor likely to lead to the discovery of admissible evidence.
 13

14 **INTERROGATORY NO. 29:** Identify each Public Event, and the venue
 15 where that event took or takes place, for which all patrons, to your knowledge, were or are
 16 subjected to an upper body pat-down as a condition of entry.

17 **ANSWER:** The Seahawks Defendants object to this Interrogatory on the
 18 ground that it is vague, overbroad, and unduly burdensome. The Seahawks Defendants are not
 19 aware of every venue where pat-downs were or are required as a condition of entry, but such
 20 venues include every venue at which NFL games are played.
 21

22 **INTERROGATORY NO. 30:** Identify each Public Event, and the venue
 23 where that event took or takes place, for which all patrons, to your knowledge, were or are
 24 subjected to a full body pat-down as a condition of entry.

25 **ANSWER:** The Seahawks Defendants object to this Interrogatory on the
 26 ground that it is vague, overbroad, and unduly burdensome. The Seahawks Defendants are not
 27

1 aware of every venue where full body pat-downs were or are required as a condition of entry,
2 but such venues include every venue at which the Super Bowl has been played since and
3 including 2002.

4 **INTERROGATORY NO. 31:** Identify all communications, and the
5 participants to those communications, relating to the impact or potential impact of increased
6 security or the implementation of the pat-down policy at Qwest Field or other NFL stadiums
7 on any insurance premiums for any policy for which a defendant or the NFL is a named
8 insured.
9

10 **ANSWER:** The Seahawks Defendants object to this Interrogatory on the
11 ground that it is overbroad, unduly burdensome, and seeks information that is neither relevant
12 nor likely to lead to the discovery of admissible evidence.
13

14 **INTERROGATORY NO. 32:** Describe the relationship between and among
15 defendants First & Goal, Inc., Football Northwest, LLC, and the Public Stadium Authority.

16 **ANSWER:** First & Goal Inc. and Football Northwest, LLC, are corporate
17 entities under common ownership and control. First & Goal Inc., as lessee, and the Public
18 Stadium Authority, as lessor, are parties to a commercial Master Lease Agreement for Qwest
19 Field, which has already been produced by Defendant PSA.
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RESPONSES AND OBJECTIONS TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents

relating to policies and procedures for security at Qwest Field since 2002, including but not limited to policies and procedures for searching or screening patrons attending events at Qwest Field.

RESPONSE: In response to this request, the Seahawks Defendants have undertaken a reasonable search for documents sufficient to show their policies and procedures for screening Patrons attending Seattle Seahawks games since 2002. To the extent that such documents have been identified and have not already been produced, the Seahawks Defendants will produce such documents. To the extent that this Request calls for a more extensive search or for the production of additional documents, the Seahawks Defendants object on the grounds that it is vague, overbroad, unduly burdensome, and seeks documents neither relevant nor likely to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 2: Please produce all documents

relating to security, terrorist attacks, threats of terrorist attacks, the safety of workers, and/or the safety of Patrons at Qwest Field.

RESPONSE: The Seahawks Defendants have undertaken a reasonable search for documents relating to Patron security at Seattle Seahawks games, terrorist attacks at Qwest Field, or threats of terrorist attacks at Qwest Field. To the extent that such documents have been identified and have not already been produced, the Seahawks Defendants will produce such documents. To the extent that this Request calls for a more extensive search or for the production of additional documents, the Seahawks Defendants object on the grounds that it is

1 vague, overbroad, unduly burdensome, and seeks documents neither relevant nor likely to lead
2 to the discovery of admissible evidence.

3 **REQUEST FOR PRODUCTION NO. 3:** Please produce all documents,
4 including correspondence, relating to the creation, development, institution, enforcement, or
5 implementation of the policy or procedure requiring “pat-down” searches of individuals
6 attending Seahawks games at Qwest Field.

7
8 **RESPONSE:** The Seahawks Defendants have undertaken a reasonable search
9 for documents responsive to this Request. To the extent that such non-privileged, non-
10 protected documents have been identified and have not already been produced, they will be
11 produced.

12 **REQUEST FOR PRODUCTION NO. 4:** Please produce all documents
13 relating to conducting “pat-down” searches, bag searches, metal detection devices, explosive-
14 sniffing dogs, or other similar security measures for events at Qwest Field.

15
16 **RESPONSE:** The Seahawks Defendants have undertaken a reasonable search
17 for documents responsive to this Request relating to security measures at Seahawks games at
18 Qwest Field. To the extent that such documents have been identified and have not already
19 been produced, the Seahawks Defendants will produce responsive, non-privileged documents.
20 To the extent that this Request calls for a more extensive search or for the production of
21 additional documents, the Seahawks Defendants object on the grounds that it is vague,
22 overbroad, unduly burdensome, and seeks documents neither relevant nor likely to lead to the
23 discovery of admissible evidence.
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1 **REQUEST FOR PRODUCTION NO. 5:** Please produce all documents
2 relating to the training, supervision, screening, or employment of individuals conducting
3 customer screening services for Patrons attending events at Qwest Field.

4 **RESPONSE:** The Seahawks Defendants have undertaken a reasonable search
5 for documents responsive to this Request relating to training, supervision, screening or
6 employment of individuals conducting pat-downs at Seahawks games at Qwest Field. To the
7 extent that such non-privileged, non-protected documents have been identified and have not
8 already been produced, the Seahawks Defendants will them. To the extent that this Request
9 calls for a more extensive search or for the production of additional documents, the Seahawks
10 Defendants object on the grounds that it is vague, overbroad, unduly burdensome, and seeks
11 documents neither relevant nor likely to lead to the discovery of admissible evidence.
12

13 **REQUEST FOR PRODUCTION NO. 6:** Please produce all contracts or
14 agreements relating to any company, contractor, or subcontractor that is providing, has
15 provided, or with whom you have or have had a contractual agreement to provide security
16 services at Qwest Field identified in response to Interrogatory No. 9.
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18 **RESPONSE:** In response to this Request, the Seahawks Defendants have
19 undertaken a reasonable search for responsive documents. To the extent that such documents
20 have been identified, they will be produced.
21

22 **REQUEST FOR PRODUCTION NO. 7:** Please produce all documents
23 relating to any threats of terrorist or other violent attacks, including but not limited to suicide
24 bomb attacks, against Qwest Field or Patrons or employees at Qwest Field identified in
25 response to Interrogatory No. 11.
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1 **RESPONSE:** In response to this Request, the Seahawks Defendants have
2 undertaken a reasonable search for responsive documents. To the extent that such documents
3 have been identified and have not already been produced, they will be produced.

4 **REQUEST FOR PRODUCTION NO. 8:** Please produce all documents
5 relating to any specific instance of planned or an attempted terrorist bomb attack at Qwest
6 Field identified in response to Interrogatory No. 13.

7 **RESPONSE:** Interrogatory No. 13 was withdrawn by plaintiffs' February 23,
8 2007 letter.

9 **REQUEST FOR PRODUCTION NO. 9:** Please produce all documents
10 relating to any specific instance in which Qwest Field security personnel have discovered any
11 explosive device or devices at Qwest Field through pat-down searches or any other means
12 identified in response to Interrogatory No. 14.

13 **RESPONSE:** In light of the Seahawks Defendants' response to Interrogatory
14 No. 14, there are no responsive documents.

15 **REQUEST FOR PRODUCTION NO. 10:** Please produce all documents
16 relating to any incidents or reports of violence or threatened violence at Qwest Field of which
17 you are which involved the use of firearms, explosives, incendiary devices, weapons of mass
18 destruction or other devices capable of harming large numbers of people identified in response
19 to Interrogatory No. 15.

20 **RESPONSE:** In response to this Request, the Seahawks Defendants have
21 undertaken a reasonable search and have not identified any responsive documents.

22 **REQUEST FOR PRODUCTION NO. 11:** Please produce all contracts,
23 agreements or other documents relating to security requirements imposed upon or applicable
24

1 to any person or entity contracting to use Qwest Field for the purposes of holding sporting
2 events or competitions, concerts or other events open to the general public.

3 **RESPONSE:** The Seahawks Defendants object to this Request on the ground
4 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
5 likely to lead to the discovery of admissible evidence.
6

7 **REQUEST FOR PRODUCTION NO. 12:** Please produce written reports
8 containing the information required to be included in such reports by F.R.C.P. 26 relating to
9 any expert whom you expect to call as a witness at trial, along with copies of all documents
10 provided to such experts to the extent such documents have not been produced in response to a
11 Request for Production herein.

12 **RESPONSE:** To the extent that information required by Rule 26 has not been
13 included in the Declarations of experts expected to be called as witnesses at trial, the
14 Seahawks Defendants will make that information available to plaintiffs' counsel. Copies of
15 any document upon which any expert relied that has not otherwise been made available will
16 also be produced. To the extent that this request calls for any additional documents, the
17 Seahawks Defendants object on the ground that it is overbroad and unduly burdensome and
18 seeks documents neither relevant nor likely to lead to the discovery of admissible evidence.
19

20 **REQUEST FOR PRODUCTION NO. 13:** Please produce all documents
21 relating to any analysis, review, study, or consideration relating to the policy requiring pat-
22 down searches of patrons entering Qwest Field for Seahawks games.
23

24 **RESPONSE:** In response to this Request, the Seahawks Defendants have
25 undertaken a reasonable search and have not identified any responsive documents.
26
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1 **REQUEST FOR PRODUCTION NO. 14:** Please produce all documents and
 2 communications between or among you, the Public Stadium Authority or the National
 3 Football League, or any other person relating to this lawsuit or to the policy requiring pat-
 4 down searches of Patrons entering Qwest Field for Seahawks games.

5 **RESPONSE:** In response to this Request, the Seahawks Defendants have
 6 undertaken a reasonable search for documents constituting to communications between the
 7 Seahawks Defendants, the NFL, and/or PSA relating to the pat-down policy for Seattle
 8 Seahawks games. To the extent any such non-privileged, non-protected documents have been
 9 identified, they will be produced. To the extent that this Request seeks the production of any
 10 additional documents, the Seahawks Defendants object on the ground that it is overbroad,
 11 unduly burdensome, and seeks documents neither relevant nor likely to lead to the discovery
 12 of admissible evidence.
 13
 14

15 **REQUEST FOR PRODUCTION NO. 15:** Please produce all documents
 16 relating to any analysis, review, study or consideration of alternative measures you have
 17 considered for screening Patrons entering Qwest Field.

18 **RESPONSE:** In light of the fact that pat-downs are required for all NFL
 19 games at Qwest Field, the Seahawks Defendants have not undertaken any analysis, review,
 20 study or consideration of alternative measures for screening patrons at Seahawks games, and
 21 there are no such responsive documents. To the extent that this Request seeks the production
 22 of any additional documents, the Seahawks Defendants object on the grounds that it is
 23 overbroad, unduly burdensome, and seeks documents neither relevant nor likely to lead to the
 24 discovery of admissible evidence.
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 27

1 **REQUEST FOR PRODUCTION NO. 16:** Please produce all documents
2 relating to any agreement between or among you, the Public Stadium Authority or the
3 National Football League, or any other person to indemnify, hold harmless, pay defense costs
4 for or otherwise pay any loss, judgment, or expenses you may suffer as a result of this lawsuit.
5

6 **RESPONSE:** The Seahawks Defendants object to this Request on the ground
7 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
8 likely to lead to the discovery of admissible evidence.

9 **REQUEST FOR PRODUCTION NO. 17:** Please produce all
10 correspondence between or among you and counsel for the Public Stadium Authority and all
11 correspondence between you and counsel for the National Football League.
12

13 **RESPONSE:** The Seahawks Defendants object to this Request on the ground
14 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
15 likely to lead to the discovery of admissible evidence. The Seahawks Defendants also object
16 to this Request to the extent it seeks documents and communications that are subject to the
17 attorney-client privilege, work-product privilege, common interest privilege or joint defense
18 privilege.
19

20 **REQUEST FOR PRODUCTION NO. 18:** Please produce all documents
21 evidencing training materials, training manuals, or other materials used to train personnel
22 providing security services at Qwest Field.

23 **RESPONSE:** In response to this Request, the Seahawks Defendants have
24 undertaken a reasonable search for training materials and manuals for persons conducting pat-
25 downs at Seattle Seahawks games. To the extent that such documents have been identified
26
27

1 and have not already been produced, the Seahawks Defendants will produce responsive, non-
2 privileged documents.

3 **REQUEST FOR PRODUCTION NO. 19:** Please produce all documents
4 evidencing any policies, procedures, requirements or practice for conducting background
5 checks for any personnel having access to Qwest Field, including but not limited to
6 background checks for employees of the Public Stadium Authority, First & Goal, Inc.,
7 Football Northwest, LLC, and the National Football League.
8

9 **RESPONSE:** The Seahawks Defendants object to this Request on the ground
10 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
11 likely to lead to the discovery of admissible evidence. Nonetheless, and without waiving that
12 objection, in response to this Request, the Seahawks Defendants have undertaken a reasonable
13 search for responsive documents. To the extent that such documents have been identified and
14 have not already been produced, they will be produced.
15

16 **REQUEST FOR PRODUCTION NO. 20:** Please produce all videos,
17 photographs, or other media in your possession showing, documenting, or memorializing
18 security screening procedures at Qwest Field, including but not limited to procedures for
19 searching Patrons entering Qwest Field, procedures for searching employees entering Qwest
20 Field, procedures for detecting explosive devices and other weapons, and procedures to
21 prevent unauthorized access to Qwest Field.
22

23 **RESPONSE:** In response to this Request, the Seahawks Defendants have
24 undertaken a reasonable search for videos, photographs and similar media prepared for the
25 purpose of showing, documenting, or memorializing security screening procedures at Qwest
26 Field and have not identified any responsive documents. To the extent this Request seeks
27

1 additional documents, the Seahawks Defendants object to this Request on the ground that it is
2 overbroad, unduly burdensome and seeks information that is neither relevant nor likely to lead
3 to the discovery of admissible evidence.

4 **REQUEST FOR PRODUCTION NO. 21:** Please provide documents
5 evidencing the cost of security measures taken to screen or search Patrons (or their bags or
6 possessions) entering Qwest Field for each year beginning in 2002.

7
8 **RESPONSE:** The Seahawks Defendants object to this Request on the ground
9 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
10 likely to lead to the discovery of admissible evidence.

11 **REQUEST FOR PRODUCTION NO. 22:** Please produce all documents
12 relating to policies, procedures or practices to conduct background searches or other screening
13 measures on personnel who provide security services at Qwest Field.

14
15 **RESPONSE:** The Seahawks Defendants object to this Request on the ground
16 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
17 likely to lead to the discovery of admissible evidence. Nonetheless, and without waiving this
18 objection, in response to this Request, the Seahawks Defendants have undertaken a reasonable
19 search for responsive documents. To the extent that such documents have been identified and
20 have not already been produced, they will be produced.

21
22 **REQUEST FOR PRODUCTION NO. 23:** Please produce any and all
23 contracts or agreements between and/or among any of defendants, the NFL, and any third-
24 party provider of security services (including, but not limited to, Guardsmark and any other
25 provider of security consulting services) since 2002.

1 **RESPONSE:** In response to this Request, the Seahawks Defendants have
 2 undertaken a reasonable search for contracts between or among any of defendants or the NFL,
 3 on the one hand, and any third party provider of security services, on the other. Any
 4 responsive documents identified in response to this Request will be produced. To the extent
 5 this Request seeks additional documents, the Seahawks Defendants object to this Request on
 6 the ground that it is overbroad, unduly burdensome and seeks information that is neither
 7 relevant nor likely to lead to the discovery of admissible evidence.
 8

9 **REQUEST FOR PRODUCTION NO. 24:** Please produce any and all
 10 documents and communications internal to, between and/or among any of the defendants, the
 11 NFL, and any third-party provider of security services (including, but not limited to,
 12 Guardsmark and any other provider of security consulting services) since 2002, relating to
 13 security at Qwest Field, including but not limited to, internal and third-party security audits.
 14 This request applies not only to documents and communications directed specifically to Qwest
 15 Field, but also to those relating to NFL stadiums in general.
 16

17 **RESPONSE:** In response to this Request, the Seahawks Defendants have
 18 undertaken a reasonable search for internal documents, or documents between or among the
 19 defendants, on the one hand, and the NFL or any third party provider of security services, on
 20 the other, relating to pat-downs or the threat of a terrorist incident at Qwest Field. Any
 21 responsive documents identified in that search will be produced. To the extent this Request
 22 seeks additional documents, the Seahawks Defendants object to this Request on the ground
 23 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
 24 likely to lead to the discovery of admissible evidence.
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1 **REQUEST FOR PRODUCTION NO. 25:** Please produce any and all
 2 communications internal to, between and/or among any of defendants, the NFL, and any third-
 3 party provider of security services (including, but not limited to, Guardsmark and any other
 4 provider of security consulting services) since 2002, relating to each specific terrorist attack
 5 that formed the basis for implementation of the NFL mandated pat-down policy at Qwest
 6 Field.
 7

8 **RESPONSE:** In response to this Request, the Seahawks Defendants have
 9 undertaken a reasonable search for internal documents, or documents between or among the
 10 defendants, on the one hand, and the NFL or any third party provider of security services, on
 11 the other, relating to the basis for the NFL mandated pat-down policy. Any responsive
 12 documents identified in that search will be produced. To the extent this Request seeks
 13 additional documents, the Seahawks Defendants object to this Request on the ground that it is
 14 overbroad, unduly burdensome and seeks information that is neither relevant nor likely to lead
 15 to the discovery of admissible evidence.
 16

17 **REQUEST FOR PRODUCTION NO. 26:** Please produce a list of Seahawks
 18 season ticket prices for each season beginning with the 2002 season.

19 **RESPONSE:** Set for below is the range of general admission ticket prices for
 20 the 2002-2007 seasons:
 21

22 2002: \$20 - 280

23 2003: \$23 - 280

24 2004: \$20 - 280

25 2005: \$23 - 288

26 2006: \$29 - 305
 27

1 2007: \$33 - 320

2 **REQUEST FOR PRODUCTION NO. 27:** Please produce all documents
3 relating to the issue of Patrons bringing alcoholic beverages into Qwest Field or other NFL
4 stadiums and/or the resulting impact on sales of alcoholic beverages within such stadiums.
5

6 **RESPONSE:** The Seahawks Defendants object to this Request on the ground
7 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
8 likely to lead to the discovery of admissible evidence.

9 **REQUEST FOR PRODUCTION NO. 28:** Please produce a list of Seahawks
10 season ticket holders for the 2005 and 2006 seasons.

11 **RESPONSE:** The Seahawks Defendants object to this Request on the ground
12 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
13 likely to lead to the discovery of admissible evidence.
14

15 **REQUEST FOR PRODUCTION NO. 29:** Produce each insurance policy
16 covering any period between January 1, 2002 to the present on which any defendant or the
17 NFL is a named insured.

18 **RESPONSE:** The Seahawks Defendants object to this Request on the ground
19 that it is overbroad, unduly burdensome and seeks information that is neither relevant nor
20 likely to lead to the discovery of admissible evidence.
21

22 **REQUEST FOR PRODUCTION NO. 30:** Please produce any and all
23 contracts or agreements between and/or among any defendants and/or the NFL.

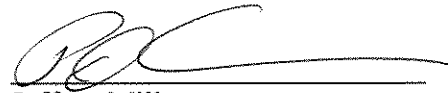
24 **RESPONSE:** In response to this Request, the Seahawks Defendants will
25 produce a copy of the NFL Constitution and Bylaws. To the extent that this Request seeks any
26 additional documents, the Seahawks Defendants object on the ground that it is overbroad,
27

1 unduly burdensome and seeks information that is neither relevant nor likely to lead to the
2 discovery of admissible evidence.

3 Respectfully submitted,

4
5
6 *Of Counsel:*

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Inc.*

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CERTIFICATION

Paul Schieck certifies as follows:

1. I am the Assistant General Manager for First & Goal Inc.
2. The factual information contained in the foregoing Defendants the Seattle Seahawks Objections and Responses to Plaintiffs First Set of Interrogatories is true and correct to the best of my knowledge and belief, based upon information available to me.


Paul Schieck

March 19, 2007

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of March, 2007, a copy of the foregoing was sent to all counsel for the parties in the manner indicated below:

By Federal Express and Electronic Mail

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